

EXHIBIT A

Court of Common Pleas of Philadelphia County
Trial Division
Civil Cover Sheet

| | | For Prothonotary Use Only (Docket Number) | |
|---|--|---|--------------|
| | | JULY 2023 | 01202 |
| | | E-Filing Number: 2307022783 | |
| PLAINTIFF'S NAME RICHARD HORN | | DEFENDANT'S NAME E.I. DUPONT DE NEMOURS AND COMPANY | |
| PLAINTIFF'S ADDRESS 195 CAROON ROAD POPLAR BRANCH NC 27965 | | DEFENDANT'S ADDRESS 974 CENTRE ROAD WILMINGTON DE 19805 | |
| PLAINTIFF'S NAME | | DEFENDANT'S NAME JOHN DOE, INDIVIDUALS, 1-5 | |
| PLAINTIFF'S ADDRESS | | DEFENDANT'S ADDRESS 123 MAIN STREET ANYTOWN PA 19111 | |
| PLAINTIFF'S NAME | | DEFENDANT'S NAME ABC CORPORATIONS, 1-5 | |
| PLAINTIFF'S ADDRESS | | DEFENDANT'S ADDRESS 123 MAIN STREET ANYTOWN PA 00000 | |
| TOTAL NUMBER OF PLAINTIFFS 1 | TOTAL NUMBER OF DEFENDANTS 3 | COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions | |
| AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00 | COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Commerce <input type="checkbox"/> Settlement <input checked="" type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Minors <input type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> W/D/Survival <input type="checkbox"/> Other: | | |
| CASE TYPE AND CODE 2T - TOXIC TORT PERSONAL INJURY | | | |
| STATUTORY BASIS FOR CAUSE OF ACTION | | | |
| RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER) | | FILED PRO PROTHY JUL 13 2023 G. IMPERATO | |
| | | IS CASE SUBJECT TO COORDINATION ORDER? YES NO | |
| TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>RICHARD HORN</u> Papers may be served at the address set forth below. | | | |
| NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY MIRIAM B. BARISH | | ADDRESS ONE LOGAN SQUARE 130 NORTH 18TH STREET SUITE 1600 PHILADELPHIA PA 19103 | |
| PHONE NUMBER (215) 790-4571 | FAX NUMBER (215) 875-7713 | | |
| SUPREME COURT IDENTIFICATION NO. 72622 | | E-MAIL ADDRESS mbarish@anapolweiss.com | |
| SIGNATURE OF FILING ATTORNEY OR PARTY MIRIAM BARISH | | DATE SUBMITTED Thursday, July 13, 2023, 11:36 am | |

ANAPOL WEISS
BY: MIRIAM BENTON BARISH, ESQUIRE
RIKI R. STROSSER, ESQUIRE
ROBERT G. DEVINE, JR., ESQUIRE

I.D. Nos. 72622, 89543 & 327833

One Logan Square, Suite 1600

130 North 18th Street

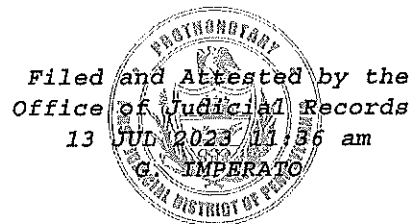
Philadelphia, PA 19103

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rstrosser@anapolweiss.com

bdevine@anapolweiss.com



ATTORNEYS FOR PLAINTIFF

RICHARD HORN

195 Caroon Road

Poplar Branch, NC 27965

Plaintiff

v.

**E.I. DUPONT DE NEMOURS AND
 COMPANY**

974 Centre Road

Wilmington, DE 19805

and

**JOHN DOE INDIVIDUALS, 1-5 and
 ABC CORPORATIONS, 1-5**

Defendants

**COURT OF COMMON PLEAS
 PHILADELPHIA COUNTY**

CIVIL ACTION

No.

JURY TRIAL DEMANDED

COMPLAINT IN CIVIL ACTION
NOTICE TO DEFEND

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

**PHILADELPHIA BAR ASSOCIATION
 LAWYER REFERRAL AND INFORMATION SERVICE
 ONE READING CENTER
 PHILADELPHIA, PA 19107
 TELEPHONE: (215) 238-1701**

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas las páginas siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomará medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puese perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEPHONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

**ASOCIACION DE LICENCIADOS DE FILADELFIA
 Servicio De Referencia E Información Legal
 One Reading Center
 Filadelfia, Pennsylvania 19107
 Telephono: (215) 238-1701**

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Plaintiff

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E.I. DUPONT DE NEMOURS AND

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COMPLAINT

AND NOW comes the Plaintiff, Richard Horn, by and through his attorneys, Anapol Weiss, and sets forth the following Complaint in Civil Action.

PARTIES

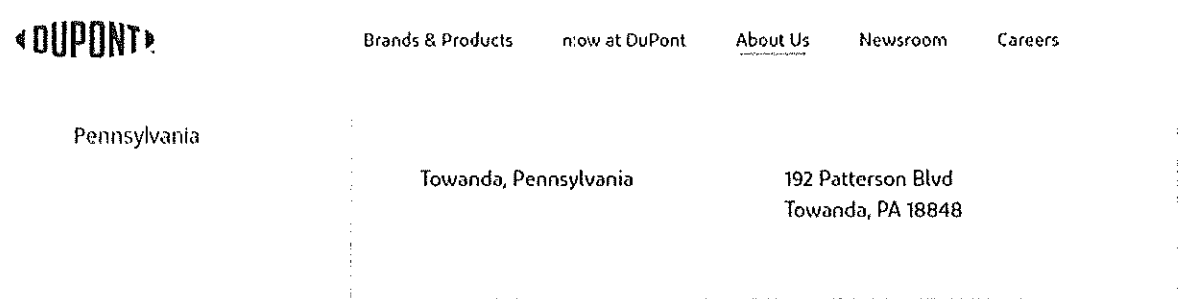
1. Plaintiff, Richard Horn, is an adult individual and citizen of the state of North Carolina residing at 195 Caroon Road, Poplar Branch, NC 27965.

2. Defendant, E.I. du Pont de Nemours and Company (hereinafter "DuPont"), is a corporation duly organized and existing under the laws of the state of Delaware with its principal place of business and/or headquarters located at 974 Centre Road, Wilmington, DE 19805.

3. At all times material hereto, DuPont is registered to do business in the Commonwealth of Pennsylvania.

4. At all times material hereto, DuPont engaged in business on a regular, systematic, continuous, and substantial basis within the County of Philadelphia, and purposefully directed its activities at the Commonwealth of Pennsylvania.

5. Upon information and belief, and at all times material hereto, as set forth on DuPont's website, DuPont has a manufacturing facility, research center, and/or offices located at 192 Patterson Blvd., Towanda, Pennsylvania 18848.



6. Upon information and belief, and at all times material hereto, as set forth on DuPont's website, DuPont boasts that it has numerous featured brands, product lines, and associated industries.



Brands & Products

Now at DuPont

About Us

Newsroom

Careers

 Search | Product Finder

Featured Brands

Kevlar®

Nomex®

Corian®

Tyvek®

Molykote®

GREAT STUFF™

Styrofoam™

Liveo™

View All Brands

Featured Product Lines

Construction Materials

Fabrics, Fibers & Nonwovens

Packaging Materials & Solutions

Personal Protective Equipment

Solar / Photovoltaic Materials

View All Product Lines

Medical Devices & Materials

Water Solutions

Electronics & Industrial

Adhesives

Featured Industries

Automotive

Building & Construction

Energy

Government & Public Sector

Military, Law Enforcement & Emergency Response

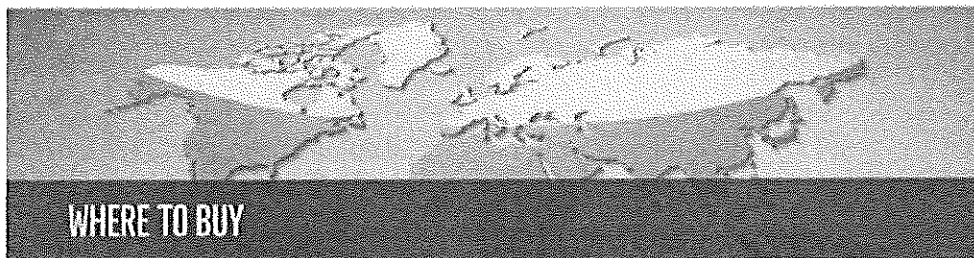
Packaging & Printing

Safety & Protection

Water Management

View All Industries

7. Moreover, upon information and belief, and at all times material hereto, as set forth on DuPont's website, DuPont sells and distributes the aforementioned brands and products through a distribution center, Arbill, located at 10450 Drummond Road, **Philadelphia, PA** 19182.



Distributors for Tyvek®, Tychem®, ProShield® and Tyvek® IsoClean® Garments and Accessories

Aramco

1480 Grandview Ave
Paulsboro, NJ 08066
800-767-6933
www.aramco.com

Arbill

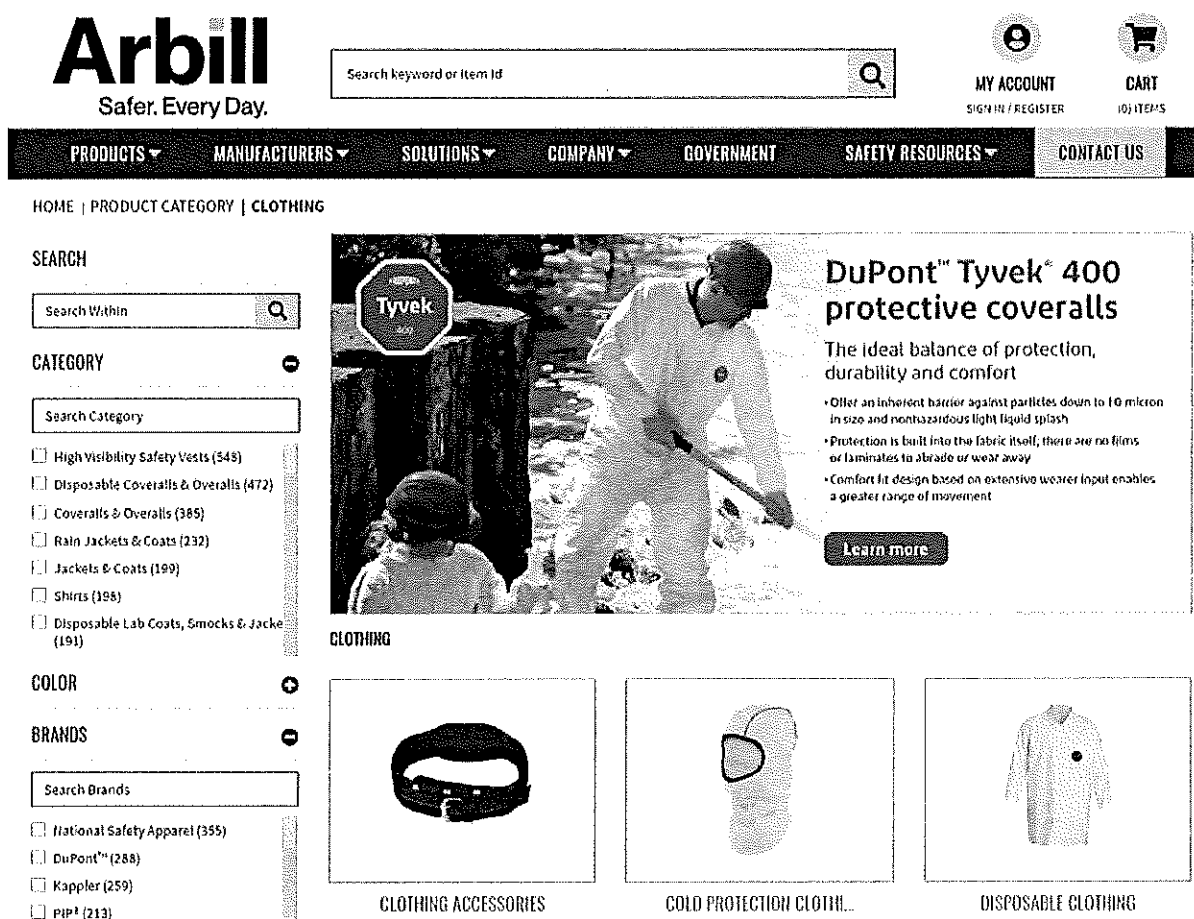
10450 Drummond Road
Philadelphia, PA 19182
800-523-5367
www.arbill.com

Argus-Hazco

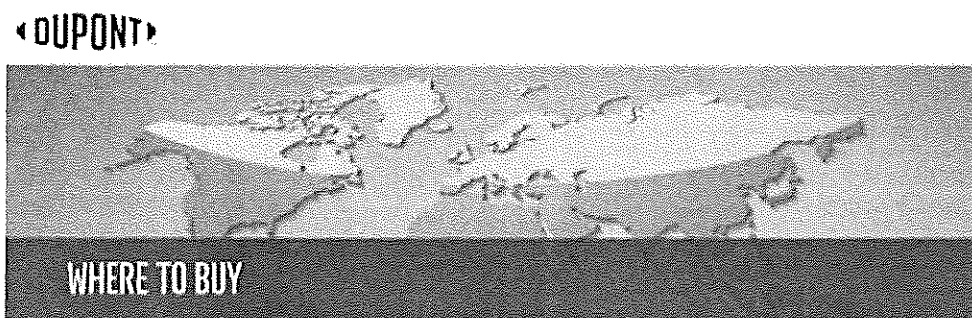
46400 Continental Dr.
Chesterfield, MI 48047
800-332-0435
www.argus-hazco.com

8. Upon information and belief, Arbill is one of the area's exclusive distribution centers for DuPont's featured brand, Tyvek, making Arbill's location in Philadelphia an essential factor to DuPont's financial success in the Philadelphia region.

9. Indeed, DuPont, and its featured brands and product lines, are specifically marketed and advertised on Arbill's website, targeting, and selling to consumers not only in Philadelphia but also in the Commonwealth of Pennsylvania and around the country.



10. In addition to Arbill, upon information and belief, and at all times material hereto, as set forth on DuPont's website, DuPont sells and distributes the aforementioned brands and products through a wholesaler, Material Concepts, Inc., located at 11620 Caroline Road, Philadelphia, PA 19154.



Authorized Wholesalers for Tyvek[®], Tychem[®], ProShield[®] and Tyvek[®] Isoclean[®] Garments and Accessories

Daniel Safety Products, Inc.

4039 Nixon Chapel Road
Albertville, AL 35950
800-910-3891
www.danielsafetyproducts.com

Material Concepts, Inc. Tyvek[®] Roll Goods Wholesaler

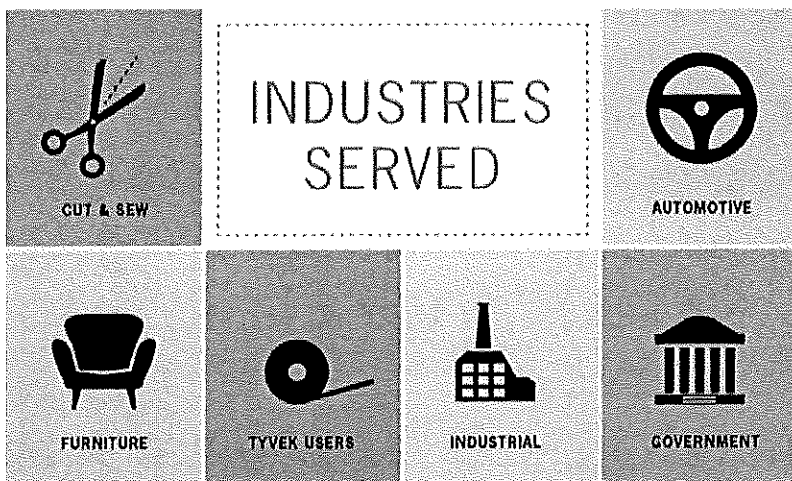
11620 Caroline Road
Philadelphia, PA 19154
215-338-6515
www.materialconcepts.com

The Safety Zone, LLC

39 Industrial Park Road
Centerbrook, CT 06409
800-821-5702
www.safety-zone.com

11. Similar to Arbill, DuPont, and its featured brands and product lines, is specifically marketed and advertised on Material Concepts, Inc.'s website, targeting and selling to consumers not only in Philadelphia but also in the Commonwealth of Pennsylvania and around the country.

800-372-3366
info@materialconcepts.com



DUPONT™ TYVEK®

Authorized DuPont® Tyvek
Distributor

DuPont® Tyvek® is part of a family of tough, durable
sheet products used in a variety of applications.
Material Concepts is a leading authorized supplier of
many Tyvek® styles.

CUT & SEW

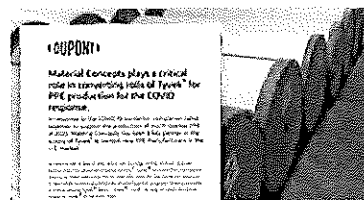
Perforated Kraft

Material Concepts' Perforated Kraft underlay paper
provides optimum performance and field proven air
filtration on all automated cutting systems. Available in
a wide range of styles, sizes, and hole patterns. Material
Concepts Perforated Kraft underlay paper is smooth,
strong, and crisp.

LATEST NEWS

Material Concepts Completes
ISO 9001:2015 Certification

Material Concepts Plays Key
Role in Converting Tyvek® for
PPE Production



COVID-19:

How Material Concepts Is Responding

An important message to our customers
regarding the Coronavirus outbreak

12. In addition to DuPont's presence in Philadelphia, upon information and belief, and at all times material hereto, as set forth on DuPont's website, DuPont sells and distributes the aforementioned brands and products through numerous other distribution and wholesale centers throughout the Commonwealth of Pennsylvania¹ including but not limited to:

- a. 911 Safety Equipment located at 329 E. Main Street, Norristown, PA 19401;
- b. Airgas located at 259 North Radnor-Chester Road, Radnor, PA 19087;
- c. Clark-McKibben Safety Products, Inc. located at 2001 Hampton Road, Erie, PA 16508;

¹ <https://www.dupont.com/personal-protection/chemical-protective-clothing-distributors.html>

- d. Critical Tool located at 3005 Broadhead Road, Bethlehem, PA 18020;
- e. Fairmont Supply Company located at 437 Jefferson Avenue, Washington, PA 15301;
- f. Fisher Scientific Company located at 100 Technology Drive, Pittsburgh, PA 15219;
- g. Lewis-Goetz and Company, Inc. located at 650 Washington Road, Pittsburgh, PA 15228;
- h. Premier Safety & Service, Inc. located at 2 Industrial Park Driver, Oakdale, PA 15071;
- i. Pro-Am Safety, Inc. located at 551 Keystone Drive, Warrendale, PA 15086;
- j. Stauffer Glove and Safety located at PO Box 45, Red Hill, PA 18076;
- k. Supreme Safety, Inc. located at 21 Richard Road, Warminster, PA 18976;
- l. TheSafetyHouse.com located at 99 Aldan Avenue, Suite 5, Glen Mills, PA 19342; and
- m. VWR International located at 100 Matsonford Road, Radnor, PA 19087.

13. Upon information and belief and at all times material hereto, DuPont conducted regular, systematic, continuous, and substantial business within the Commonwealth of Pennsylvania, including within the County of Philadelphia.

14. There may exist additional Defendants which Plaintiff has been unable to identify after having conducted a reasonable search with due diligence, to date. These entities include any property management companies, outside contractors and/or property inspectors hired by and/or engaged by Defendants to ensure the safety of its employees and/or its facility. For purposes of this Complaint, said individuals or business entities have been named as fictitious John Doe Individuals, 1-5 and ABC Corporations, 1-5. Should discovery reveal the identities of additional Defendants who negligently, carelessly, and recklessly caused and/or contributed to Plaintiff's

injuries and damages as described herein, Plaintiff will amend the Complaint accordingly pursuant to the Pennsylvania Rules of Civil Procedure.

VENUE

15. At all times material hereto, DuPont carried on, and continues to carry on, regular, systematic, continuous, and substantial business activities within the County of Philadelphia as aforesaid.

16. Under Pa.R.C.P. 2179(a)(2), venue may be laid against DuPont in Philadelphia County since it “regularly conducts business” in Philadelphia County as explained at length above.

FACTS

17. Plaintiff, Richard Horn, spent his career from 1979 to 1992 working at DuPont Connector Systems, formerly known as FCI USA, Inc., and prior to that it was Berg Electronics, located at 320 Busser Road in Emigsville, York County, Pennsylvania 17318.

18. Plaintiff held various positions while employed by DuPont, and from 1979 to 1982, Plaintiff worked as a material handler and press operator.

19. From 1982 to 1992, Plaintiff, while still employed by DuPont, worked as a tool and die maker.

20. Plaintiff's daily tasks as a tool and die maker included but were not limited to repairing metal stamping dies and creating inner connectors.

21. While employed by DuPont, and in his role as a tool and die maker, Plaintiff was in regular and direct contact with various chemicals including but not limited to trichloroethylene (hereinafter “TCE”) that was used to remove oil and clean stamped connectors.

22. Plaintiff was exposed to TCE at the DuPont facility. Open drums of liquid TCE were present in his work area and he used it on a regular basis to clean parts and tools as part of

his regular job duties, which inevitably caused liquid TCE to come in contact with his skin. Plaintiff was also regularly exposed to fumes from the TCE which became airborne and were inhaled by Plaintiff for up to eight hours a day, over a period of years while working for Defendant. During his employment, Plaintiff was never warned about exposure to TCE or provided any breathing protection or other personal protective equipment ("PPE") by Defendant.

23. TCE is a known carcinogen and is highly toxic and hazardous.

24. Prolonged or repeated exposure to TCE causes kidney cancer, non-Hodgkin lymphoma, liver cancer, and other diseases and illnesses.

25. Workers are exposed to TCE primarily by breathing in vapors and through skin contact with vapors and/or liquid.

26. At all times material hereto, DuPont represented to Plaintiff that the areas and locations where he was working in the aforementioned facility, including the area where he was completing tasks, were safe and Plaintiff relied upon DuPont's representations and/or recommendations.

27. At all times material hereto, DuPont never provided nor required Plaintiff to wear a respirator to appropriately guard against exposure to TCE fumes.

28. At all times material hereto, DuPont stored TCE in voluminous, 55-gallon drums throughout the building that were not covered as well as in roughly 50 to 100 open cleaning tanks located in the area of the building's presses.

29. At all times material hereto, DuPont's facility where Plaintiff worked was not properly ventilated despite the presence and regular use of open containers of TCE.

30. Upon information and belief, it was not until the 1990s that DuPont removed the TCE from its York County, Pennsylvania facility – years after Plaintiff had already experienced regular and direct contact and exposure with TCE as aforesaid.

31. As a direct and proximate result of Defendant's carelessness and negligence described herein, Plaintiff was frequently, continuously, and directly exposed to TCE, and was caused to sustain serious and permanent personal injuries including but not limited to stage three kidney cancer, that was diagnosed on September 13, 2021, and required surgical removal of two kidney tumors.

32. As a further direct and proximate result of Defendant's carelessness and negligence described herein, Plaintiff expended and continues to expend various sums of money for medical care and treatment.

33. As a further direct and proximate result of Defendant's carelessness and negligence described herein, Plaintiff suffered a loss of earnings necessitated by the diagnosis and treatment of his kidney cancer which required surgery and subsequent recovery and follow-up medical care.

34. As a further direct and proximate result of Defendant's carelessness and negligence described herein, Plaintiff suffered and continues to suffer from physical and emotional pain and suffering.

35. As a further direct and proximate result of Defendant's carelessness and negligence described herein, Plaintiff suffered physical scarring and humiliation caused by his diagnosis of kidney cancer and subsequent surgery and medical treatment.

36. As a further direct and proximate result of Defendant's carelessness and negligence described herein, Plaintiff has been, and continues to be limited in and/or prevented from

participating in his usual and daily activities and avocations thereby suffering a loss of life's pleasures to Plaintiff's great detriment and loss.

COUNT I – NEGLIGENCE
Plaintiff v. All Defendants

37. Plaintiff incorporates by reference the allegations set forth in the previous paragraphs of this Complaint as though the same were set forth at length herein.

38. As an employee of DuPont, Plaintiff was owed the highest duty of care throughout his employment from 1979 to 1992.

39. DuPont controlled the work areas where Plaintiff's injuries occurred including but not limited to its York County plant and/or facility located at 320 Busser Road, Emigsville, Pennsylvania 17318.

40. DuPont also controlled the tasks that Plaintiff was assigned.

41. DuPont, directly and by and through its agents, servants and/or employees, directed, operated, maintained, influenced, and/or controlled all work performed at its plant and/or facility, and at all times material hereto, was responsible for providing employees, such as Plaintiff, with a safe work environment free from dangerous and hazardous conditions.

42. DuPont, directly and by and through its agents, servants and/or employees, knew or should have known that the work conditions at the aforementioned plant and/or facility created an unreasonable risk of physical harm, and required its employees, including Plaintiff, to perform abnormally dangerous activities while performing their assigned job duties.

43. DuPont knew or should have known that TCE is a carcinogen and is highly toxic and dangerous and was required at all times to comply with applicable OSHA standards and regulations.

44. The unreasonable risk of harm and the abnormally dangerous activity arose from the presence and regular use of large, uncovered quantities of TCE located in, at or near Plaintiff's work areas.

45. DuPont, directly and by and through its agents, servants and/or employees, required its employees to work in conditions that it should have recognized as likely to create an unreasonable risk of physical harm to others unless special safety precautions were taken and in place.

46. The careless, negligent, willful, wanton and/or recklessly indifferent conduct on behalf of Defendant DuPont, by and through its agents, servants and/or employees, consisted of the following:

- a. Exposing Plaintiff to a harmful and dangerous carcinogen, namely TCE, for an extended period of time;
- b. Using TCE as a cleaning product when it knew, or should have known, that TCE was toxic, poisonous and caused extreme risk of harm to the health of persons inhaling, ingesting, coming in contact with or otherwise absorbing it through their skin into their bodies;
- c. Failing to provide instructions concerning the safe methods of working with and/or around TCE;
- d. Failing to take necessary, adequate or proper precautions to prevent or restrict the escape, eruption, leakage and release of the hazardous TCE liquid and fumes in locations where Plaintiff was working;
- e. Failing to warn Plaintiff regarding the dangers and health risks posed by working in close proximity to large open containers of TCE in his work areas at Defendant's plant/facility;
- f. Failing to ensure that accurate warnings and information was conveyed to Plaintiff regarding the health risk caused to him and others by the use and presence of open containers of TCE in his work areas;
- g. Requiring Plaintiff to perform the aforesaid job assignments in areas where he was exposed to dangerous and hazardous conditions created by the use of and

presence of large open containers of TCE in the areas where Plaintiff was working;

- h. Failing to provide and ensure that Plaintiff wore PPE, such as respirators, gloves or protective clothing, or any other safety devices to protect him from the dangerous and hazardous conditions created by the TCE used and located in the areas Plaintiff was working;
- i. Failing to conduct adequate or proper job hazard or safety analyses of Plaintiff's job assignment and tasks in light of the hazardous and dangerous conditions created by the presence and use of TCE at Defendant's plant;
- j. Requiring Plaintiff to perform his job assignments and tasks in work areas which were not free from recognized hazards and that were likely to cause him serious physical harm;
- k. Failing to exercise reasonable care regarding the location, storage and use of TCE at the Defendant's plant/facility;
- l. Failing to comply with industry and governmental standards and regulations regarding the location, storage and use of TCE at the Defendant's plant/facility;
- m. Failing to implement, incorporate and enforce proper or adequate safety measures regarding the use of TCE at Defendant's plant/facility location;
- n. Failing to train and supervise its agents, servants and/or employees on appropriate safety policies and procedures regarding the use and storage of TCE;
- o. Failing to develop and implement policies and procedures to adequately and properly maintain and/or inspect TCE within said plant/facility;
- p. Breaching its duty to ensure a safe work environment for Plaintiff by failing to exercise reasonable and ordinary care to protect its employees from exposure to a known carcinogen, TCE;
- q. Failing to warn Plaintiff that working with and around TCE created serious risk to his health, including but not limited to the risk of being diagnosed with cancer;
- r. Failing to provide any engineering controls to protect Plaintiff from inhaling, ingesting, contacting or otherwise absorbing TCE into his body;
- s. Failing to institute a monitoring policy to measure the amount of TCE being released into the air at the aforesaid plant/facility or to monitor exposure levels to TCE of their employees;
- t. Failing to adequately cover and store TCE at the aforesaid plant/facility;

- u. Failing to adequately ventilate the aforesaid plant/facility;
- v. Violating applicable local, state, federal, and/or industry standards and regulations regarding occupational use and storage of TCE, including but not limited to, all applicable OSHA regulations.

47. Defendant possessed superior knowledge and information regarding the health hazards and risks of exposure to TCE which it knew or should have known that Plaintiff would not appreciate, been aware of, or taken the initiative to protect himself from these risks during his employment with it.

48. Defendant failed to exercise reasonable care by not taking precautions to protect its employees, including Plaintiff, against the unreasonable risk of harm posed by high levels of TCE present at its facility.

49. As a direct and proximate result of Defendant's carelessness and negligence described herein, Plaintiff was exposed to TCE during the course and scope of his employment with Defendant, and this exposure caused him to sustain serious and permanent personal injuries, including but not limited to, stage three kidney cancer requiring surgery.

50. As a further direct and proximate result of Defendant's carelessness and negligence described herein, Plaintiff expended and continues to expend money for medical care and treatment.

51. As a further direct and proximate result of Defendant's carelessness and negligence described herein, Plaintiff suffered loss of income and loss of, or diminution of, the ability to earn income in the future.

52. As a further direct and proximate result of Defendant's carelessness and negligence described herein, Plaintiff has suffered and continues to suffer physical and emotional pain and suffering.


53. As a further direct and proximate result of Defendant's carelessness and negligence described herein, Plaintiff has suffered physical scarring and humiliation caused to him by his injuries.

54. As a further direct and proximate result of Defendant's carelessness and negligence described herein, Plaintiff has been prevented, and/or limited from, attending his usual and daily activities and avocations causing him a loss of life's pleasures to Plaintiff's great detriment and loss.

55. Defendant acted willfully, wantonly and with reckless indifference and as a direct result caused the Plaintiff severe pain and suffering, severe emotional distress, and mental anguish and harm.

WHEREFORE, Plaintiff demands judgment against Defendants jointly, severally, individually and/or in the alternative for an amount in excess of Fifty Thousand Dollars (\$50,000.00) in compensatory plus punitive damages, interest, delay damages, costs of suit, and any other further relief as is deemed equitable and just by the Court.

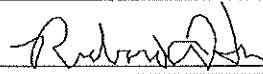
ANAPOL WEISS

By: 
MIRIAM BENTON BARISH, ESQUIRE
RIKI R. STROSSER, ESQUIRE
ROBERT G. DEVINE, JR., ESQUIRE
Attorneys for Plaintiff

Date: July 13, 2023

VERIFICATION

I, Richard Horn, hereby state that I am the Plaintiff in the within action and verify that the statements made in the foregoing Complaint in Civil Action are true and correct to the best of my knowledge, information, and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa. C.S.A. §4904 relating to unsworn falsification to authorities.

Electronically Signed 2023-07-11 23:26:12 EDT - 11420637217
Horn, Richard Signed  5206237a-6105-4f5a-bc32-682901959d51

RICHARD HORN

Date: 7/11/2023